

Herculaneum Letter from Denise Jordan Izaguirre to Doe Run 1/27/03

Dear Mr. Gray:

I am writing in response to your letter of December 3, 2002, requesting that the Agency for Toxic Substances and Disease Registry (ATSDR) offer an opinion on the possibility of re-occupying the homes that Doe Run owns in Herculaneum, Missouri. It is outside of ATSDR's mandate to address legal issues that may be associated with re-occupying these properties. We are willing, however, to render an opinion on the public health implications of re-occupancy.

In formulating our public health opinion, ATSDR will consider the following:

- There are approximately 4-5 homes, owned by Doe Run in the voluntary buy out zone (within 3/8 miles of the facility), that are currently being considered for re-occupancy;
- Doe Run proposes to extend limited leases, allowing for adults-only occupancy (through January 2005) of the properties;
- Doe Run reports that the homes have been thoroughly cleaned and renovated. Further, Doe Run can provide recent analytical data to verify the post clean up lead levels; and,
- Clean up activities included lead paint abatement in all homes and removal of carpets in some homes.

We recognize that these homes might be used in providing insight on the recontamination issues in Herculaneum. Collecting current samples will not only help verify the effectiveness of your cleaning efforts, but might shed light on the questions of recontamination from interior sources such as wall voids and attics (without the confounding factor of materials potentially being tracked in from outside). We recommend that these homes be considered for possible inclusion in the ongoing recontamination study efforts.

While it seems possible that the actions you have taken and the proposed re-use scenario may sufficiently address concerns related to exposure to lead in these homes, we cannot render a final public health opinion until we receive and review the data verifying your clean up efforts. In addition to the analytical data for each of the homes in question, we will need to understand how you intend to monitor and enforce the lease restrictions (limiting occupancy to adults) you propose.

Once we receive this information we will develop a public health consultation documenting our public health opinion. In developing this consultation, we will work collegially with the state health department and our environmental counterparts, and will make the final public health consultation available to all stakeholders.

If you have any questions or need additional information, please feel free to contact me at 913/551-1310.

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Superfund

Sincerely,

Denise Jordan-Izaguirre
Senior Regional Representative
ATSDR Region 7

CC:
MDHSS

BCC
Wilder, Orloff, Parham, PERSB
G. Baldwin
T. Larson